

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF MISSOURI ex rel. ERIC S.
SCHMITT, Attorney General, and

STATE OF LOUISIANA ex rel. JEFFREY
M. LANDRY, Attorney General,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, *et
al.*;

Defendants.

Case No. 3:22-cv-01213

DECLARATION OF JOSHUA MCCOLLUM

1. I, Joshua McCollum, am over the age of 18 and competent to testify to the matters asserted herein.
2. I reside in St. Charles, Missouri, in the Francis Howell School District (“FHSD”), and am a parent of school-aged children.
3. I make this declaration based on personal knowledge.
4. In July 2021, as a concerned parent of a child in the FHSD, I became aware of changes FHSD was making regarding Critical Race Theory (“CRT”). Specifically, I became concerned that the curriculum writing team at FHSD was consulting an outside expert, Dr. LaGarrett King, to write a CRT-based curriculum and was strategizing how they might bypass parent concerns and hide the content of the curriculum from parents in a push for “social justice.”
5. I posted a discussion of these issues and my concerns on the social media platform Nextdoor in July 2021.

6. Nextdoor subsequently closed down my posts due to “discrimination” or “hate speech” (below), neither of which I made in the posts.

Your post was removed

It was reported for breaking a community guideline:

Discrimination

No racism, hateful language, or discrimination of any kind is tolerated on Nextdoor.

[Review this guideline >](#)

The one-week appeal window has expired.

[Close](#)

7. In fact, I failed to notice anything that was majorly concerning in the thread (below):

Post hidden See why

 Joshua McCollum • Hickory Ridge • 18 Jul
FHSD Critical Race Theory. Who else is irate about this decision? I am going to the board meetings to make my voice heard. If not I plan to start home schooling next year.
Posted in Ask a Neighbor to Anyone
 16 Like 139 Comments Share

 Richard Moore • Country Creek
Irate is an understatement for me.
18 Jul Share

 Lynne Tomlinson • Country Creek
Will be going to board meetings.
18 Jul Share

 Kathleen McIntosh • Pinewoods
Will be actively voting AGAINST current board members. I thank God my grandkids are in good Catholic schools which have none of this disgusting hate oriented courses offered at all.
18 Jul Share
[See 2 previous replies](#)

 Andrea Duncan • Park Charles
I thank GOD we are raising our kids in a church that works to bridge the Racial devision not keep it going.
18 Jul Share

 Genevieve Lindner • Spencer Creek North
You do know CRT was not what was voted on, right? They approved 2 ELECTIVES at the high school level, that's it. Be irate over something that actually happened
18 Jul Share
[See 3 previous replies](#)

 Julie Rickert • Park Charles
Do you guys actually know what CRT is, or are you basing your opinions on things you've heard or read from biased news and social media stories? It's actually been around in schools for 40 years, but misinformation is just now being spread about it, most likely to fan the flames of people who are not aware of what it is. This is a great article that explains it better, shared with me from a non-biased publication for teachers by a friend who has been a teacher for several years. I would encourage people to read up on what it is and isn't before becoming irate. <https://www.edweek.org/leadership/what-is-critical-race-theory-and-why-is-it-under-attack/2021/05>
18 Jul Share

 Genevieve Lindner • Spencer Creek North
Julie Rickert i just started that link too
18 Jul Share

 Jennifer Floyd • Pegasus Farms
When is the next board meeting? I want to make sure I am there.
18 Jul Share

 Jennifer D. • Dahlia Ct/Graystone Dr/Foxglove Dr
Joshua McCollum I've been to a few, but I typically watch from home. The screens can be a bit difficult to view on the YouTube channel, so I usually pull up the agenda so I can see it better.

I'd double check the location prior to going. I think they have changed to one of the newly acquired buildings instead of the administration building.

19 Jul Share

 Genevieve Lindner • Spencer Creek North
Some resources for everyone's research:
<https://www.facebook.com/292173704574462/posts/1269971166794706/>
<https://www.edweek.org/leadership/what-is-critical-race-theory-and-why-is-it-under-attack/2021/05>

audience, you do not see the items listed under consent on our screens. We will work on a solution to this. The claim that the decision happened behind closed doors is false. We returned back to closed session to discuss matters of personnel that were not finished prior to open session.

A few more details surrounding the transparency of the courses:

Oct 20th- The FHSD held an informational community night

April 15th- BOE meeting with a Best Practice on our two courses

18 Jul Share

 See 1 previous reply

 Julie Rickert • Park Charles
Josh you ua McCollum my daughter had a preschool teacher who had some troubling opinions about what girls should and shouldn't do. I only know this because my daughter talked to me about what she learned in class, and she repeated comments she had heard there, and I told her my opinions about all of it. If people are involved in their kids' education like that, they can voice their opinions to their kids and the teachers. Your kids are going to learn all sorts of things from teachers, other kids, TV, etc. You just have to be there when they're younger to answer their questions and listen to them, but unfortunately I think it's pretty rare for most people to be that involved. I applaud you for trying to learn as much as you can so you can be informed and involved in their education. Whatever your opinions and beliefs, you are showing that you care about them and that will make them better adults.

18 Jul Share

 Beverly Furqueron • Park Charles
I'm irate too! Maybe we need to do a peaceful protest or does anyone have any other ideas for getting their attention about what a horrible idea this is!

18 Jul Share

 See 1 previous reply

 Joshua McCollum • Hickory Ridge Author

Best protest is to take the kids out of school. They make money from the government based on their attendance.

18 Jul Share

8. I became aware of a video on Rumble based on content obtained from publicly available sources and Missouri Sunshine Law requests regarding footage of a Zoom meeting between Dr. King (and proponents of implementing CRT) and teachers of FHSD, which supported my concerns. My posts linking to this video were closed by Nextdoor.

9. On or about July 28, 2021, in the midst of discussing with others a recent school board meeting related to masks, and whether FHSD would keep its policy of optional masking versus change their policy to mandatory masking, I decided to launch an online petition to encourage the board members to keep their optional masking policy and *not* change to mandatory masking.

10. I posted this petition on change.org, a platform designed for online petitions, and it received as many as 280 signatures.

11. The posting of this petition on change.org was the beginning of the shadow-banning and blocking of my Nextdoor account.

12. After I started to share my online petition link on Nextdoor, I noticed that when I posted about the masking issue, I received no comments on my posts, whereas before I had been getting

comments very quickly, within five to ten minutes. I have an acquaintance who posted about the issue on his Nextdoor account, and he was receiving comments.

13. I also noticed if I posted the same link to the petition, but hid the “change.org” domain, my post would receive replies, as if Nextdoor were filtering this domain. However, shortly thereafter, my post would then be closed again within a few hours.

14. On August 6, 2021, my Nextdoor account was banned for one month due to “spreading misinformation.”

15. Subsequently, on August 12, 2021, FHSD decided to reinstate their mandatory masking policy, shortly after the voice of myself and the 280 fellow petition signers was suppressed.

16. There were petitions encouraging reinstatement of mandatory masking, but our contrary petition was suppressed by Nextdoor.

17. I am a parent simply trying to have a voice in my local school district and its policies regarding my own children, but social media has stooped down to censor even my voice within my local community.

I swear or affirm under penalty of perjury that the foregoing is true and correct.

Dated: June 8, 2022

Signed: /s/ Joshua McCollum